

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

RONNIE GILES,

PLAINTIFF,

V.

**CIVIL ACTION NO:
3:06-cv-00528-WKW-VPM**

MASTERBRAND CABINETS, INC.,

DEFENDANT.

PLAINTIFF'S REQUESTED VOIR DIRE

COMES NOW the Plaintiff and proposes the following voir dire to be given by the Court. Plaintiff understands he will be allowed to ask additional questions.

1. Have you or any member of your family ever been in a Union? If so, please provide details.
2. How many of you have heard of Master Brand Cabinets?
3. How many of you know anyone who worked for or has used any product of Master Brand?
4. Would the fact that you have used their product influence your verdict, pro or con, in this case?
5. Have any of you ever been in management at your current or any previous job?
6. Please provide details in what management jobs you have had.

7. Have you ever been involved with disciplining employees, including either firing or recommending their termination of employment? Please provide details.

8. Have you or anyone in your immediate family ever worked in a Human Resources capacity for an employer? If so, have you been involved with consistent application of discipline for employees?

9. Have you been involved with drafting of employment policies? Have you been involved with decisions regarding discipline up to and including termination of employment?

10. Have any of you ever been involved with either filing a charge of discrimination or retaliation with the Equal Employment Opportunity Commission or acting on behalf of your employer in dealing with a charge of discrimination or retaliation filed by a co-worker? Provide details.

11. Have any of you filed an internal grievance with a company that you worked for or handled grievances as part of your job duties for your employer regarding anything dealing with discrimination or unfair work practices? Please provide details

12. Have you or any immediate member of your family ever owned a business? If so, please provide details.

13. Have you or any member of your family ever been involved in the insurance business? If so, please provide details.

14. Has any of you ever heard of, used the services, or know any lawyers in the law firm of Baker and Daniels of Indianapolis, Indiana? If so, please give details.

15. This lawsuit is about the Family Medical Leave Act. Have you or any member of your family ever taken medical leave from your employer pursuant to that Act? Please elaborate.

16. Have you ever been denied leave that you sought pursuant to the Family Medical Leave Act from your employer? Please elaborate.

17. You have met the Plaintiff, Ronnie Giles, whom I am sure you have noticed is African American. The witnesses for the company are white. Would those facts make you be inclined to rule one way or the other in this case as a result of the race of the parties?

18. Race has nothing to do with this case. I tell you that as the judge, and both the parties agree. It has to do only with the Family Medical Leave Act. I want each of you to raise your hand to commit to the fact that, if chosen to serve on this jury, that you will rule upon the evidence that you hear during the trial and not be influenced by the race of any witness. Please raise your hand if you will so agree to rule on the evidence only.

19. Have any of you ever been accused of retaliation in regards to your work? If so, please provide details.

Respectfully submitted,

/s/ David R. Arendall

David R. Arendall

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CERTIFICATE OF SERVICE

I have filed the foregoing with the Clerk of the Court using the CM/ECF system on August 6, 2007:

Mark J. Romaniuk
Kelley Bertoux Creveling

/s/ David R. Arendall

Of Counsel